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— ADVOCATES —

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Robert B. Sobelman
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One St. Andrew's Plaza
New York, NY 10007

RE: *U.S. v. Avenatti*
19-cr-374

Gentlemen:

It has come to my attention that the defense filed Pre-Trial Motions (Dkt. 115), attaching the entire *WhatsApp* download (61 pages) of text communications between my client, [REDACTED] and the Defendant, her lawyer at the time of the text communications.

The *WhatsApp* communications from [REDACTED] to the Defendant cover a time period of approximately 12 months and, in many instances, contain candid and confidential disclosures relating to her immediate family, friends and intimate details of her life. [REDACTED] has been cooperative and transparent in reporting the crimes perpetrated by the Defendant against her. The communications in the subject exhibit contain all of [REDACTED]'s *WhatsApp* conversations with the Defendant and clearly document the deceit he employed and the actions he took to steal funds from her. The majority of the text communications have little to no relevance to the issues in the criminal charges against the Defendant but were produced by [REDACTED] at the Government's request for transparency relating to the Defendant's statements and actions.

I urge you to take timely action to seal and protect these candid, confidential, and personal communications. The Second Circuit in *S.E.C. v. TheStreet.Com*, 273 F.3d 222, provides a useful analysis for the Court relating to statements and materials supplied voluntarily by witnesses in a federal prosecution.

Please keep me informed of any rulings relating to this issue.

Sincerely,



Clark O. Brewster

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